REMARKS

Applicants have carefully considered the Office Action dated June 4, 2002 and the references cited therein. Applicants respectfully request reexamination and reconsideration of the application.

Applicants have amended the specification to correct minor grammatical errors and to eliminate an unused reference number. No new matter is believed added to the application by way of these proposed amendments to the specification, as set forth herein.

The Examiner has objected to the specification because the claims do not start on a separate sheet. In response, Applicants enclose with this response replacement pages 39, 40, 41, 42 and 43 with claim 1 starting on page 39. These pages are to replace pages 39, 40, 41, and 42, respectively, as filed. No new matter is added to the application by these replacement pages.

The Examiner has indicated that the application has been filed with informal drawings which are acceptable for examination purposes only. Applicants respectfully direct the Examiner's attention to a preliminary amendment mailed April 2, 2002 in which formal drawings for Figs. 1-11C were submitted for the Examiner's consideration. Applicants respectfully request that the Examiner use the formal drawings when examining the application and that the Official Draftsman review and approve the same.

Applicants submit herewith proposed corrections to Figs. 7A-B to conform the figures to the description in the specification (page 25, lines 29-31). No new matter is believed added to the application by the corrections to the drawings proposed herein.

Before addressing the Examiner's rejections, Applicants request that the Examiner consider the following. The present invention provides a method and system for enabling users to log on remotely over a computer network to a server containing a compilation of cards. Using a GUI, the user can personalize the card(s) through various modifications, e.g., changes in the graphics, font color, font size, font style, attachment of scanned information, such as a signature or a photo. The card, including the changes thereto, can be viewed in What You See Is What You Get (WYSIWYG) format by the user so the user can see what the modified card will look like prior to acceptance thereof. The card can be sent to a mailing address, as defined by the user, either by

itself or in conjunction with a gift or other item associated with the card transaction. Accordingly the present invention allows a personalized card to match with a gift and sent together with the gift to the designated recipient. None of the cited references discloses the ability to modify the card and see the modifications superimposed with the database copy of the card in WYSIWYG format, or to allow the card to be matched with a gift and shipped together.

Claims 1-5, 11-24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 5,870,718, Spector, in view of U.S. Patent 5,555,496, Tackbary et al., hereafter "Tackbary".

Applicants respectfully traverse the rejection of claims 1-5, 11-24 under 35 U.S.C. §103(a) on the grounds that the Examiner has failed to create a *prima facie* case of obviousness. In accordance with MPEP §2143.03, to establish a *prima facie* case of obviousness 1) the prior art reference (or references when combined) must teach or suggest *all* of the claim limitations; 2) there must be some suggestion or motivation to modify a reference or combine references; and 3) there must be a reasonable expectation of success.

Claim 1 recites the limitation of "presenting an image of the card in combination with the received modifications in WYSIWYG format" (claim 1, lines 5-6). The Examiner has indicated that Spector discloses presenting an image of a card in combination with received modifications in WYSIWYG format. Applicants have reviewed the sections of Spector cited by the Examiner and respectfully disagree with the Examiner's interpretation. Particularly, in Spector, (column 3, lines 64-column 4, lines 6), Spector teaches that a user operating a keyboard 13 selects from software 15 whatever text and graphics he/she wishes to appear on the greeting card section of a composite card 20, as shown separately in Fig. 2 thereof. Fig. 2 is described as the composite greeting card and gift certificate card produced by the *terminal* (Spector, column 3, lines 16-17), not as presented on video screen 14. There is no teaching or disclosure that the card, as illustrated in Fig. 2, will be displayed on the video screen 14. The present invention specifically discloses presenting an image of the card in combination with the received modification(s) in WYSIWYG format as now recited in claim 1. Tackbary does not supply the teachings missing from Spector. Tackbary discloses, in Fig. 5 thereof, the

displaying of the front of the card 660 and the inside of the card 665 and further indicates that the user may choose to update or personalize the card with a message, however, there is no teaching, suggestion or disclosure that the card in conjunction with the modifications be displayed in WYSIWYG for viewing by the user. Accordingly, neither Spector nor Tackbary disclose the limitation of presenting an image of the card in combination with the received modifications in WYSIWYG format, as recited in Fig. 1.

Further, method claim 1 distinctly claims the limitation of "maintaining a network accessible compilation cards" (claim 1, line 2). Spector does not disclose a network accessible compilation of cards. Specifically, greeting card software 15 is part of the computer/printer terminal, as illustrated in Fig. 1 of Spector. Although the computer-printer terminal of Spector is linked to the Internet 10 via modem 11, there is no disclosure or teaching in Spector that a process outside of the computer-printer terminal may access the greeting card software 15 via Internet 10 and modem 11. Given the limited description of the computer-printer terminal in Spector, and specifically the greeting card software 15, the Examiner has not demonstrated that software 15 does anything other than simply reside in the memory of the computer-printer terminal and interact with "computer 12" through either a peripheral connection or an internal bus. Accordingly, Spector does not disclose maintaining a network accessible compilation of cards as disclosed in the present invention and as recited in claim 1.

In light of the above, Applicants respectfully assert that claim 1 is patentable over Spector and Tackbary whether considered singularly or in combinations. Claims 2-11 include all the limitations of claim 1 and are believed allowable over Spector and Tackbary for at least the same reasons as claim 1.

Computer program product claim 12 includes limitations similar to claim 1 and specifically recites "program code for receiving data defining modifications to the cards" and "program code for presenting an image of the card in combination with the received modifications in WYSIWYG format" (claim 12, lines 6-8). Accordingly, claim 12 is believed allowable over Spector and Tackbary, whether considered singularly or in combination, for at least the same reasons as claims 1.

Apparatus claim 19 also includes limitations similar to claim 1 including "program logic configured to receive data identifying one of the plurality of cards and further

defining modifications to the card" and "program logic configured to present an image of the card in combination with the received modifications to the card" (claim 19, lines 5-8). Accordingly, claim 19 is believed allowable over Spector and Tackbary, whether considered singularly or in combination, for at least the same reasons as claims 1and 12. Claims 20-24 include all the limitations of claim 19 and are believed patentable for at least the same reasons as claim 19.

Claim 18 includes limitations similar to claim 1 including "viewing the modifications to the card in WYSIWYG format (claim 18, line 4). Accordingly, claim 18 is believed allowable over Spector and Tackbary, whether considered singularly or in combination, for at least the same reasons as claims 1, 12 and 19.

Claims 6-10 stand rejected under 35 U.S.C. 103(a) as being unptantalbe over Spector in view of Tackbary as applied to claim 1 above and further in view of U.S. Patent 5,072,253, Patton. In setting forth the rejection of claims 6-10, the Examiner admits that the combined teachings of Spector and Tackbary fail to disclose data defining modifications to the card as comprising data defining and graphical image such as font, color, font size, font style, data representing scanned information. Instead, the Examiner is relying on the teachings of Patton to disclose the same. The Examiner alleges that Patton discloses such teaching and that a person of ordinary skill in the art would have readily recognized the desirability and advantages of modifying Spector in view of Tackbary by employing the well-known or conventional feature of data modifying the greeting card, such as disclosed by Patton, in order to provide users to have more options to personalize and customize their greeting cards.

Applicants respectfully disagree with the Examiner's assertion, as Patton discloses nothing more than a system which includes an available library of fonts which are selectable. In the present invention, the data defining modifications to the card which, include the font color, font size, font style, scanned information, etc. are selectable and presented with the card in WYSIWYG format. The system disclosed in Patton is a film based system in which the user may select graphics and locate the graphics on an image with a reference marker, i.e. an "X", (Patton, column 5, lines 1-9). The system disclosed in Patton does not enable the user to view the image and all of the modifications thereto in WYSIWYG format. In addition, the Examiner has not shown

where in any of Spector, Tackbary or Patton there is a teaching, disclosure or suggestion that their respective teachings be combined or modified to form the present invention, as claimed. The Examiner will note that the motivation in providing a WYSIWYG view of a card including personalized modifications thereto is to enable the user to view an image of the card prior to acceptance thereof. Accordingly, Applicants respectfully assert that claims 6-10 include all the limitations of claim 1 and are believed allowable over Spector in view of Tackbary in further view of Patton for at least the same reasons as claim 1 and as further set forth above.

Regarding the rejection of claim 13, the Examiner has alleged that Spector discloses the claimed data structure except for data defining an address to which the card will be sent. Instead, the Examiner is relying on Tackbary to disclose such teaching. Applicants respectfully traverse the Examiner's assertion for the following reasons. After reviewing the sections of Spector cited by the Examiner, Applicants have been unable to find the disclosure of a data structure which includes all of the data elements recited in claim 13 as well as the further refinements of limitation D, as recited in claims 14-16. Specifically, given the limited disclosure in Spector, there is no mention of storing a data structure as recited in claim 13 in a memory associated with the computer printer terminal of Spector. Further, there mere disclosure of a plurality of stores A-C connected to Internet 10, as illustrated in Fig. 1 of Spector, does not suggest, teach or imply that the network address of one of the stores is maintained in memory in a data structure representing the card, as recited in claim 13. The claimed data structure of the present invention enables information about the card, the modifications to the card, the recipient, and the vendor transaction associated with the card to be sent as a single entity to a remote location for printing of the personalized card, matching the personalized card with a gift, and shipment of the personalized card/gift combination to the designated addressee. The Examiner has not shown where Spector teaches all of the limitations of claim 13 and has admitted that Spector does not teach the data defining an address to which the card will be sent. Even if Tackbary disclosed the teaching of data representing the address of the recipient, as stated by the Examiner, Tackbary does not supply all the teaching of data associating the card with an electronic commerce vendor transaction as missing from Spector. Accordingly,

Applicants respectfully assert that claim 13 and its respective dependent claims are patentable over the prior art references, whether considered singularly or in combination.

Applicants believe the claims are in allowable condition. A notice of allowance for this application is solicited earnestly. If the Examiner has any further questions regarding this amendment, he/she is invited to call Applicant's attorney at the number listed below. The Examiner is hereby authorized to charge any fees or credit any balances under 37 CFR §1.17, and 1.16 to Deposit Account No. 02-3038.

Respectfully submitted,

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Version Marked to Show Changes

Please substitute for the paragraph beginning on page 25, line 29 with the following:

The network user is then given the option to accept all of the change(s) to the card, as illustrated by decisional step 732. The data representing the customizations to a card are stored in database 280, as illustrated by procedural step 734. For example, Card Detail Detail (CardDetDet) Table 408 stores the specific pieces of text, the position, the color, font, etc., as well as information for any image data, photographic or scanned, as in step 760, that has been uploaded to web server 260.

Please substitute for the paragraph beginning on page 26, line 4 with the following:

Next a web page, as illustrated in Fig. 6F will be rendered which allows the network user to specify information related to the recipient, as illustrated by [decisional step 736 and] procedural step 738. Card Detail (CardDet) Table 406 stores the macro information for a customized card, like ship date, price, shipping mode, the charity to which part of the proceeds from this card will go, etc. Card Shipping Information (CardShipInfo) Table 412 stores postal address information. If the card is to accompany a gift, then there is no information entered in table 412. Card Detail (CardDet) Table 406 stores the macro information for a customized card. The storing of such information in database 280 is illustrated as procedural step 739.

1. In a computer system connectable to a computer network, a method comprising:

A. maintaining a network accessible compilation of cards;

B. receiving data identifying one of the cards;

C. receiving data defining modifications to the cards;

D. presenting an image of the card in combination with the received modifications in WYSIWYG format; and

E. receiving data identifying a destination address of the card.

2. The method of claim 1 further comprising the step of:

F. transmitting data representing modifications to the card over the computer network to a peripheral apparatus.

3. The method of claim 2 wherein step F comprises the step of:

F.1 printing the card with a peripheral device.

4. The method of claim 1 wherein the destination address comprises a postal address.

5. The method of claim 1 further comprising the step of:

F. transmitting data identifying the card over the computer network to a remote database.

6. The method of claim 1 wherein the data defining modifications to the card comprises data defining a graphical image.

7. The method of claim 1 wherein the data defining modifications to the card comprises data defining a font color.

8 The method of claim 1 wherein the data defining modifications to the card comprises data defining a font size.

9. The method of claim 1 wherein the data defining modifications to the card comprises data defining a font style.

10. The method of claim 1 wherein the data defining modifications to the card comprises data representing scanned information.

11. The method of claim 10 wherein the data defining modifications to the card comprises data representing user defined text.

12. A computer program product for use with a computer system operatively coupled to a computer network, the computer program product comprising a computer usable medium having program code embodied thereon, the program code comprising:

A. program code for maintaining a network accessible compilation of cards;

B. program code for receiving data identifying one of the cards;

C. program code for receiving data defining modifications to the cards;

D. program code for presenting an image of the card in combination with the received modifications in WYSIWYG format;

E. program code for receiving data identifying a destination address of the card.

13. In a computer usable memory, a data structure representing a card, the data structure comprising:

A. data identifying one of a plurality of card templates;

B. data identifying modifications to the identified card template; and

C. data defining an address to which the card will be sent;

D. data associating the card with an electronic commerce vendor transaction.

14. The data structure of claim 13 wherein data associating the card with an electronic commerce vendor transaction comprises:

D.1 data defining a vendor identifier.

15. The data structure of claim 13 wherein data associating the card with an electronic commerce vendor transaction comprises:

D.1 data defining a vendor transaction identifier.

16. The data structure of claim 13 wherein data associating the card with an electronic commerce vendor transaction comprises:

D.1 data defining a vendor network address.

17. The data structure of claim 13 wherein the data defining modifications to the card comprises:

graphical information and data defining the relationship of the graphical information to the card image.

18. A method for sending greeting cards over a computer network comprising:

A. selecting a card from one of a plurality of card;

B. modifying the card;

C. viewing the modifications to the card in WYSIWYG format;

D. designating a destination address;

E. transmitting any of the card identifier, data modifying the card and destination address to a remote location over a computer network;

F. authorizing printing of the card in combination with the modifications; and

G. authorizing delivery of the card to the destination address in conjunction with an electronic commerce transaction with which the card is associated.

19. A computer system connectable to a computer network comprising:

A. a processor;

B. a memory coupled to the processor for storing a plurality of card;

C. a network interface coupled to the processor in a memory;

D. program logic configured to receive data identifying one of the plurality of cards and further defining modifications to the card;

E. program logic configured to present an image of the card in combination with the received modifications to the card;

F. program logic configured to receive data identifying a destination address of the card;

G. program logic configured to receive data identifying a vendor transaction associated with the card; and

H. program logic configured to transmit any of the card identifier, data modifying the card, destination address and vendor transaction identifier to a remote location over a computer network.

20. The apparatus of claim 19 wherein data identifying a vendor transaction comprises data defining a vendor identifier.

21. The apparatus of claim 19 wherein data identifying a vendor transaction comprises data defining a vendor transaction identifier.

22. The apparatus of claim 19 wherein data identifying a vendor transaction comprises data defining a vendor network address.

23. The apparatus of claim 19 further comprising:

I. program logic configured to receive payment for the card and for remit a portion of the payment to an identified charitable entity.

24. The apparatus of claim 19 further comprising:

J. program logic configured to present a graphic user interface having an appearance similar to a vendor website.

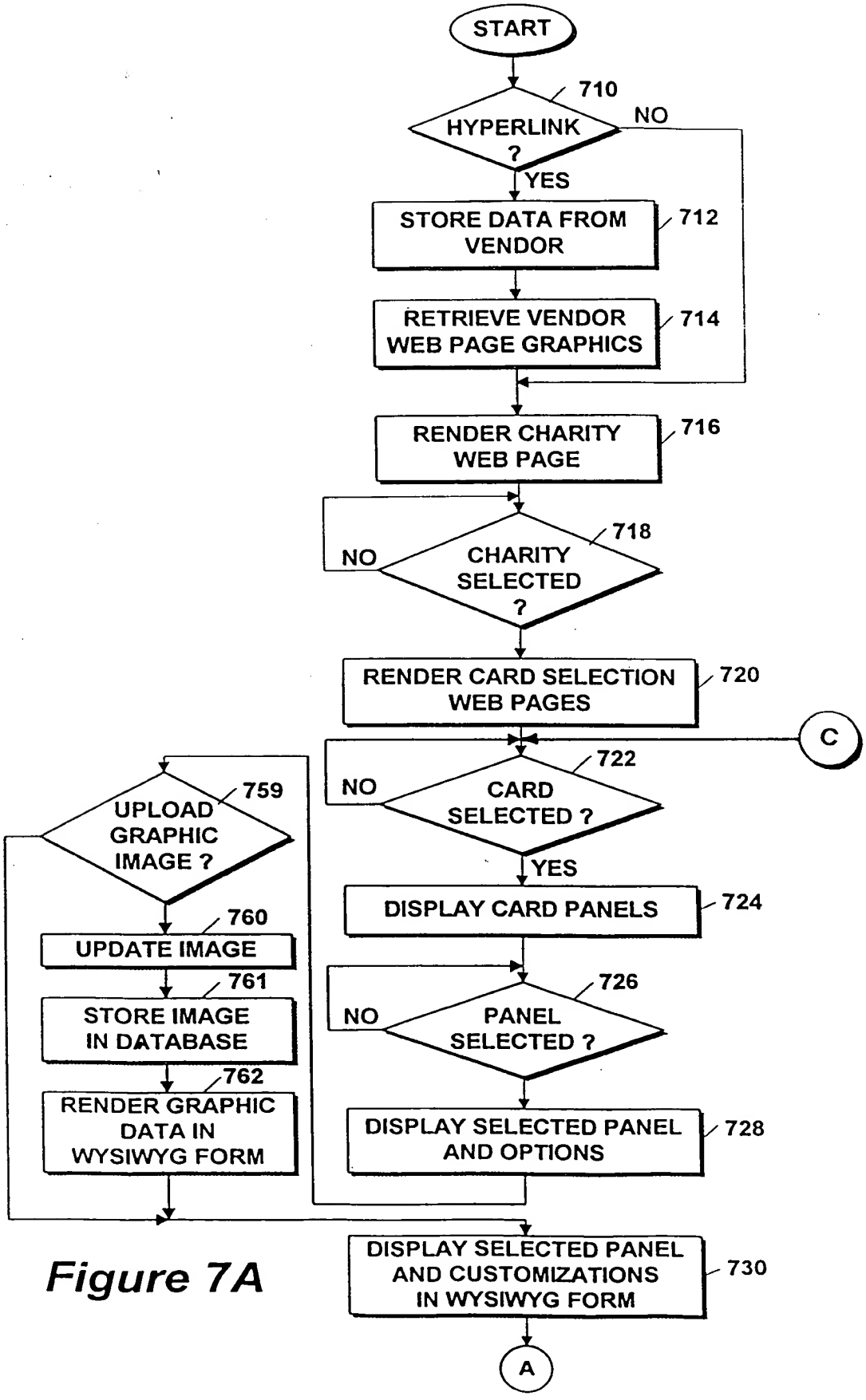

Figure 7A

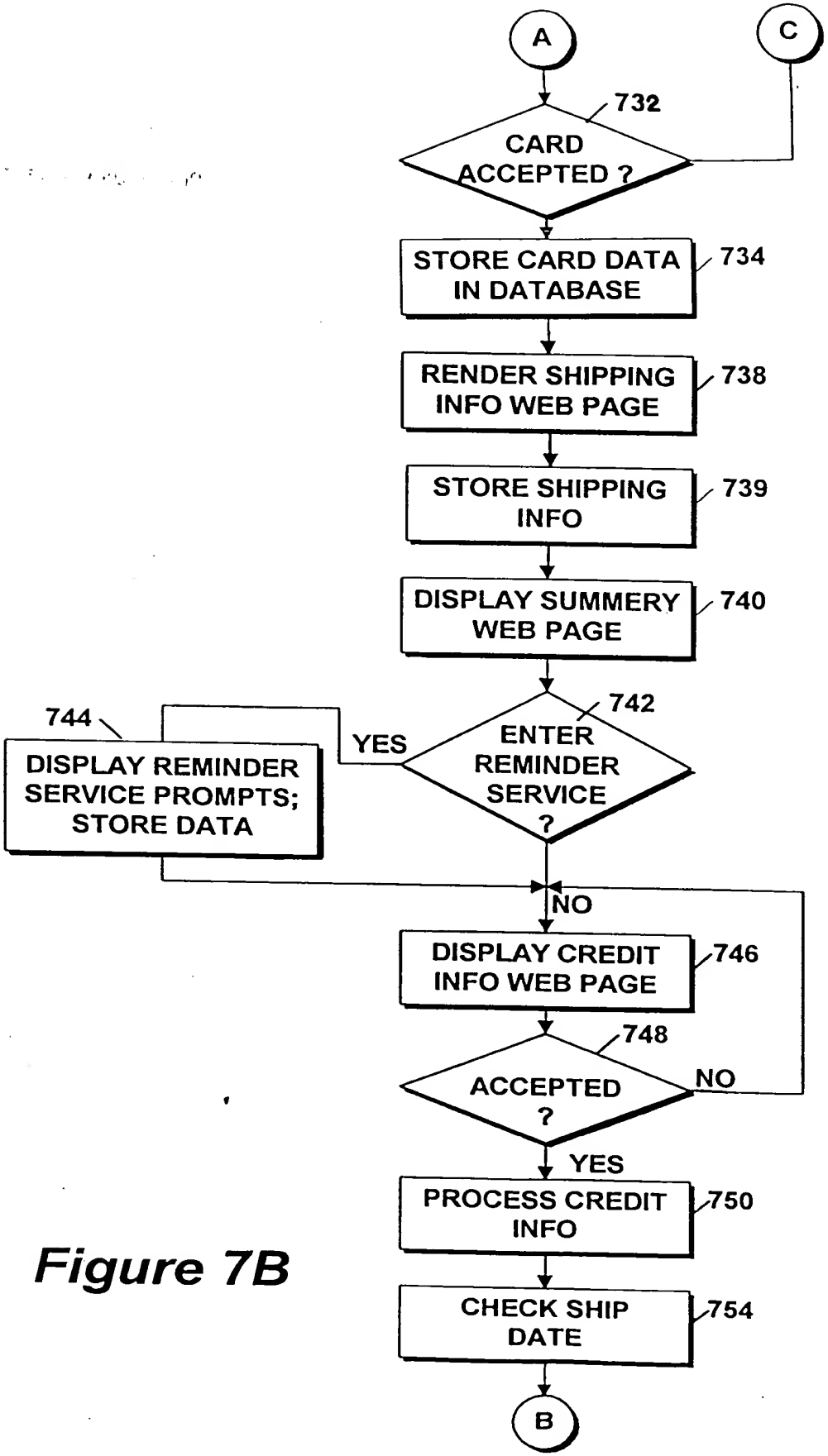

Figure 7B